



Vernal_Comments, BLM_UT <blm_ut_vernal_comments@blm.gov>

Comments on the December 2017 Competitive Oil and Gas Lease Sale Environmental Assessment

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To: blm_UT_Vernal_comments@blm.gov

July 22, 2017

Bureau of Land Management Vernal Field Office Manager and staff:

I respectfully request the permanent withdrawal of parcel UT1217-070 from this and future lease sales to protect an important pre-migration stopover area for migratory Rocky Mountain populations of the Greater Sandhill Crane (GSC).

Parcel UT1217-070 occurs on split estate on the Escalante Ranch along the Green River in Jensen, UT. The Escalante Ranch is a known pre-migration staging area for the Rocky Mountain population of GSC in late summer/early fall, yet nothing is mentioned of GSC anywhere in the Environmental Assessment's resources or issues brought forward for analysis.

Birds from ID, WY, MT stage here in Jensen in high numbers, feeding on leftover small grain crops in fields throughout Jensen, in preparation for migrating to their first major stopover in the San Luis Valley of Colorado. From there, the majority of them move on to the Rio Grande Valley of New Mexico for the winter, including Bosque del Apache National Wildlife Refuge.

I personally have observed these birds for the last two years, as I live across the Green River from the Escalante Ranch. Beginning in late August/early September I watch daily cranes fly into the fields of the Escalante Ranch from all around Jensen in the late afternoon/early evening to feed and display before dropping down onto the exposed sandbars of the adjacent Green River for safe night roosting. In September 2016 I performed at least 8 informal counts from the county road adjacent to the Escalante Ranch and estimate a count of 1500 individuals in mid-September. The attached SEPTEMBER 2016 SURVEY OF THE ROCKY MOUNTAIN POPULATION OF GREATER SANDHILL CRANES report supports my observation, as 1230 individuals were counted here in September 2016 by Utah Division of Wildlife Resources staff. Furthermore, the birds gathering at the Escalante Ranch represented 37% of all GSC counted in UT in 2016.

Hundreds of birds remained in the Jensen area into November and several still remain in Jensen into December and early January. According to Dr. Rod Drewian, retired North American crane expert from University of Idaho, the Jensen, UT area is likely of greater year-round importance to the Rocky Mountain population of GSC than previously thought, as individuals are documented during winter bird counts indicate a small population of cranes winter here. This means Jensen, UT supports a small population cranes year-round. Needless to say, the Jensen area is significant for cranes and the Escalante Ranch in particular where parcel UT1217-070 is located.

In summary, the following are reasons why I respectfully request the permanent withdrawal of parcel UT1217-070 from this and all future oil and gas lease sales:

1. I have great concern that any oil and gas-related development and ongoing maintenance activities would alter GSC use and potential return to the fields where the parcel is located, particularly during pre-migration in the late summer and early fall.

2. The stated low production potential for the parcel (Appendix D [p.185-186] states the parcel is “not within 2 miles of any historically producing wells [2010-2016].”).
3. The proximity of the parcel to Dinosaur National Monument – the parcel is in direct line of sight and approximately 1 mile from the monument visitor center. In section 3.3.9 Visual Resources (p. 31) the document states that parcel 070 is located approximately 2 miles south of Dinosaur National Monument Visitor Center. According to measurements I have taken using ArcGIS measuring tool, the parcel is less than one mile at the parcel's closest (NW corner) point and 1.5 miles at the farthest point (SW corner) from the from the Quarry Visitor Center.

Additional Comments

- In section 3.3.1. Air Quality (p.16) it states that two year-round air quality stations are used to make a NAAQS compliance determination for ozone. I would like to point out that there is a third station in the Uintah Basin that is also certified as a Federal Reference Monitor site in Jensen, UT in Dinosaur National Monument (AQS Site ID 49-047-1002). This station is operated year-round as well and has detected numerous ozone exceedances in winter months, as recently as February 2017. Why is this station not included in the air quality analysis? I request that the data from this site be incorporated in the Air Quality Affected Environment for this and all future oil and gas lease sale documents.
- Where is the surface and ground water quality analysis? How are parcels adjacent to the Green River, one of the largest perennial western rivers in the west, not subject to a thorough surface and ground water quality description and impact analysis, particularly when the Green River is designated Critical Habitat for four federally Endangered fish species? There is important spawning habitat for the federally listed razorback sucker between Split Mountain in Dinosaur National Monument and the Green River bridge in Jensen. In 2015 juvenile bonytail chub, another federally listed species, were found in the back channels of the Green River in Stewart Lake, which is now recognized as important nursery habitat for fish species of concern.

I request surface and groundwater analysis be performed for parcels along the Green River (054, 055, 065, 066, and 070). Furthermore, I request a buffer of at least one mile from perennial lotic systems be applied to all parcels in this and future lease sales to protect surface and ground water quality and aquatic species.

- I also request the permanent withdrawal of parcels 069 and 071 from this and future lease sales on account of their proximity to the western boundary and main public entrance to Dinosaur National Monument. Anticipated wells for these parcels is one out of a potential maximum of 36 (parcel 069) and one out of a potential maximum of 29 (parcel 071) based on the BLM's own historical production data for the immediate area. Simply put, these wells have a low likelihood to be producers and have the potential to have adverse impacts to viewsheds of a unit of the National Park Service and to known archaeological and paleontological resources.

Thank you for the opportunity to comment.

Sincerely,

Emily Spencer
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RMP sandhill crane fall survey report 2016 FINAL.pdf
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